

Statement by Leroy Watson, Legislative Director  
National Grange of the Order of Patrons of Husbandry

Before

The Subcommittee on Oversight and Investigations  
U.S. House of Representatives Committee on energy and commerce

For the hearing entitled:

“Germs, Viruses and Secrets: Government Plans to Move Exotic Disease Research to the Mainland U.S.”

Thursday May 22, 2008  
10:00am  
2123 Rayburn House Office Building  
Washington, D.C.

Mr. Chairman, Members of the Subcommittee:

My name is Leroy Watson. I am the Legislative Director for the National Grange, the country's oldest general farm and rural public interest organization. Originally founded in 1867, today the National Grange represents nearly 200,000 individual Grange members affiliated with more than 3000 local, county, and State Grange chapters across the United States. More than 70% of our local Grange chapters are located in communities of 5,000 people or fewer.

The National Grange would like to commend the Subcommittee on Oversight and Investigations for holding this timely hearing on proposals by the U.S. Government to relocate the Plum Island Animal Disease Center to a location on the mainland United States as part of a new National Bio-and Agro Defense Facility. We appreciate the opportunity to present our views strongly opposing the development of an animal disease research facility on the United States mainland that will work with live strains of Foot and Mouth Disease (FMD) viruses, as well as other virulent foreign animal diseases (FADs) anywhere near existing concentrations of commercial livestock. Our comments here today expand on the points we raised in a letter we sent to U.S. Secretary of Agriculture Ed Schafer on April 14, 2008, on this issue. We believe that the economic risks of a potential outbreak of FMD to family farmers and ranchers across the nation with commercial livestock operations will far outweigh the advantages the Government has put forth to justify their proposals to bring this critical and sensitive research back to the mainland and away from the isolated island research facility where it has been successfully conducted for more than fifty years.

While there are many possible scenarios for the outbreak of animal diseases that would pose a significant economic risk to family farmers and ranchers as well as to their surrounding rural communities and their natural environments, few come close to the nightmare of an outbreak of FMD in dramatically impacting many aspects of American life. Containing a major outbreak

would be a Herculean, if not impossible task. FMD is twenty times more infectious than smallpox. It causes painful blisters on the tongues, hooves, and teats of cloven animals such as cattle, pigs, goats and deer that can render them unable to walk, eat, or drink. While people and other wild animals, such as predators or carrion, do not often contract FMD, once in contact with the virus they can carry the virus in their lungs to transmit to other susceptible animals for up to forty-eight hours. The animal-to-animal airborne transmission range for a local outbreak of FMD would cover a fifty-mile radius, or an area of more than 7800 square miles.

There is no known cure for FMD once it has been contracted. Once the disease was loose on the mainland U.S., it could require mass slaughter and disposal of potentially tens of millions of individual carcasses of domestic and wild animals to control the outbreak. It would require the imposition of draconian human quarantine and decontamination measures that would disrupt general commercial activities, outdoor recreational activities like deer hunting or hiking, as well as personal freedom of mobility both in and out of the agricultural sector. It would undoubtedly disrupt the domestic and international sale of meat and meat products throughout the nation for months or even years. A 2004 research paper published by the U.S. Department of Agriculture entitled "Economic Impact of Foreign Animal Disease Outbreak Across the United States" calculated that the direct costs to the domestic livestock industry of an FMD outbreak would exceed \$60 billion. We believe the ancillary costs to general commerce, outdoor recreation, and impacts on future investments in the livestock sector by family farmers and ranchers would exceed the conservative USDA estimate of \$60 billion in direct costs by several fold.

Living with the risk of a potential FMD outbreak is something that family farmers and ranchers have had to come to grips with reluctantly over the past few years. The United States has been blessed as free of active outbreaks of FMD for more than 80 years. However, the events of 9/11, the anthrax attack of 2001, and other threat assessments have highlighted America's diversified and highly dispersed family farms and ranches as "soft" targets for any terrorist, foreign power, or even organized crime organization that wanted to strike a blow against the nation's heartland. In 2006, the National Institute of Justice, the criminal justice policy research arm of the U.S. Department of Justice, published a Research for Policy brief entitled "Agroterrorism- Why We're Not Ready" that identified FMD as the greatest agroterrorist threat facing our nation. For a number of years now, National Grange policy resolutions, generated and adopted by our grassroots members and delegates on the local, state, and national level, have called on USDA, DHS, and the law enforcement community to work cooperatively to address this threat and take proactive measures to prepare for this type of outbreak. We actually strongly support and commend DHS, USDA, and other federal agencies for taking pro-active steps to upgrade our nation's frontline bio-research capacity to combat future outbreaks of FMD and other FADs. Yet while family farmers and ranchers represented by the National Grange are currently resigned to living with the threat of the deliberate introduction of FMD or other FADs into their communities by individuals who are inimicable to our national interests, they are puzzled as to why the introduction of these dangerous pathogens onto the mainland U.S. should be facilitated by Federal Government policy, especially in light of the successful record of research and containment that the existing and geographically isolated Plum Island facilities have demonstrated for more than fifty years.

Our threat assessment concerns for locating the proposed National Bio-and Agro Defense Facility, and especially the research facilities for FMD and other virulent FADs, on the mainland fall into three broad categories:

First, failure to implement sufficient protocols and procedures to prevent accidental or incidental release of these pathogens from the NBADF;

Second, an agroterrorist attack against, or in the vicinity of, the NBADF that deliberately releases these pathogens; and

Third, ancillary economic and social damage to farming and rural communities in the vicinity of the NBADF due to the “Perceived Risk” of an outbreak. This damage would probably take two forms. First is the damage that will be derived by the individual assessments of local family farmers and ranchers to the possibility of either of the above scenarios that, in turn, create an agricultural economic investment dead zone around the facility as family farmers and ranchers avoid making future investments in any communities within a radius of at least fifty miles around the NBADF. Second is the damage from law enforcement and other prudent emergency preparedness measures that must be put in place by local, state, and Federal Government agencies in the vicinity of the NBADF that would potentially burden property, contractual and other civil rights of individuals living in the vicinity.

**The National Grange believes that DHS has not demonstrated that it has the expertise and experience to safely conduct research on FMD on the U.S. mainland.**

The National Grange is worried that any state-of-the-art bio-research facility management protocols and procedures built into the NBADF would be insufficient, on their own, to guarantee that FMD or other FAD's are not accidentally or incidentally released from the NBADF. Our concerns are based on the recent experiences in Great Britain, where over the past eight years, two outbreaks of FMD have been attributed to release from bio-research facilities working with FMD. The 2001 outbreak of FMD in Great Britain caused at least \$16 billion in damages, devastated the rural economy, and nearly caused the government to fall.

We understand that other bio-research facilities in other nations have successfully conducted their research programs on FMD. However, the experiences in Great Britain lead us to conclude that conducting federal research on dangerous animal diseases on the U.S. mainland is a risk we do not have to take. We do not share the opinion of the Administrator of the USDA Animal and Plant Health Inspection Service who responded to our April 14, 2008, letter raising our concerns to U.S. Secretary of Agriculture Ed Schafer that “...we can use that example [of the recent suspected release of live FMD from a research facility in England] as a learning opportunity...” to design a better mainland bio-research facility. Instead, we believe that it would be a prudent, cost effective and sensible precaution to couple all of the state-of-the-art bio-facility management protocols and procedures and all of the lessons learned from the outbreaks in Great Britain that DHS plans to incorporate into the design and operation of the NBADF with significant geographic isolation, such as on the existing Plumb Island facilities.

**Even if DHS is completely successful in designing a NBADF facility where accidental release of FMD or other FADs is impossible, the facility still poses significant risk to the local community because it will become a target for espionage, terrorist attacks, or as a site for a terrorist or criminal release of FMD or other dangerous pathogens.**

Even if we accept DHS and USDA's claims that a mainland NBADF can be made so secure that FMD or other FADs can never be accidentally or incidentally released from the NBADF, we remain concerned that the facility would become an inviting physical target for espionage and terrorist or criminal attacks aimed at breaching the physical and procedural barrier built into the facility and getting these pathogens out of the laboratory to eventually be released into the environment.

Moreover, we are also concerned that a mainland NBADF would provide an inviting vicinity for the release of FMD by terrorist or criminal elements that would be looking to maximize not only the economic damage from an FMD outbreak, but also the social and political confusion and fallout from this outbreak as well. Not every terrorist or criminal immediately takes public credit for his actions. We still have no definitive knowledge about who launched the 2001 anthrax attacks that closely followed the 9/11 attacks. If an FMD strain were to be released in the vicinity of the NBADF, a logical working assumption would be that the release came from the facility itself. Investigating this assumption could disrupt or delay research activity at the facility nearly indefinitely. It would divert resources from quickly apprehending those actually responsible for the release, potentially allowing them an opportunity to plan and execute a similar attack in the future. It would call into question DHS's security protocols and management of the facility all in the dynamic political and media climate of a rapidly unfolding local, regional, or even national economic and environmental disaster.

The National Grange has a high degree of respect for our nation's counter-espionage, anti-terrorist, and law enforcement agencies. Our concern is not a reflection on our confidence that these dedicated public officials would do everything in their power to prevent or foil attempted espionage, terrorist, or criminal attacks. Our concern is that a NBADF facility located on the mainland would attract an extremely broad universe of potential terrorist or criminal organizations to use an attack on the facility to advance their goals. Domestic terrorist organizations, such as the Animal Liberation Front and the Earth Liberation Front have specifically avoided attacks against human beings in favor of attacks against "property" or "research facilities" because they believe that their activities will have a greater moral acceptance. Criminal organizations, including the paramilitary drug cartels that are actively challenging the democratic sovereignty of several of our Latin American neighbors, including Mexico, could decide to use an FMD attack against, or in the vicinity of, the NBADF in the U.S. to send a propaganda message that they are above the law and that the Federal Government is powerless to stop them. The potential list of suspect organizations and even individuals is nearly limitless.

The National Grange believes that geographic isolation of the NBADF at a location such as Plumb Island remains a prudent, cost effective means of adding additional security to the facility and the vicinity. It would remove much of the incentive to make the facility an active target of espionage, terrorist, or criminal activity. The greater the isolation from livestock and wildlife, the

less economic and environmental fallout of an attack against, or in the vicinity of, the facility, and therefore the less the facility becomes a prime target. Unlike protocols, procedures, and design of the facility itself, which are largely within the control of DHS to assure that FMD or other FADs don't accidentally or incidentally escape from the facility, the time, means, and manner of an espionage, terrorist, or criminal attack against a mainland NBADF would be wholly determined by those who wish us harm.

**“Perceived risks” from either accidental or deliberate release of FMD to the surrounding communities would discourage livestock related investment and impinge on the property, contractual or civil rights of residents in surrounding communities.**

The National Grange is concerned that the establishment of the NBADF on the U.S. mainland will create a perception of risk that will stunt private investment in family farm or ranch livestock operations within the fifty-mile radius around the facility. Individual family farmers or ranchers do not have to share DHS's assessments that there are no risks associated with the location of this facility in their community. We believe that a significant portion of the family farm or ranch sized livestock production community will disinvest, move, or not expand livestock operations that they otherwise would have in response to the location of the NBADF. Over time, these individual decisions will have a significant impact on the viability of all family farm or ranch operations in the vicinity of the NBADF, as well as on the traditional social and economic fabric of the farming and rural communities that support them.

Modern family farm or ranch livestock operations often involve more than simple production that can be measured in annual sales or dollar terms. High value livestock operations, in fact, are far more likely to incorporate and market long term intrinsic characteristics of their animals as part of their livestock operations. For example, entrepreneurial animal breeding programs that are based on decades long commitments by family farmers and ranchers to add value to their animal herds through careful and systematic genetic management objectives could be lost in the blink of an eye. While we will, for the sake of argument, assume that in the case of an FMD outbreak associated with the NBADF, that reasonable monetary indemnification for the market value of a farmer's or rancher's animals would eventually be available from the government, the individual farmer's or rancher's lifetime investment of time and talent, as well as his expertise and commercial reputation in herd or breed genetic enhancement, would be forever lost.

Perceived risk also arises from a lack of general preparedness about and FMD or similar FAD outbreak in the United States at all levels. As the 2006 NIJ report points out, today the laws of most state and local jurisdictions require treating an FMD outbreak as a crime scene not an animal public health emergency. This would place the jurisdiction and responsibility for coordinating the primary first response on state and local law enforcement agencies. When a federal facility becomes the focal point for the outbreak, however, inevitably there will be jurisdiction and responsibility issues related to the conflicting responsibilities involved in investigating the outbreak and containing its spread. To date, while state officials have been forthcoming with proposals to coordinate future taxpayer expenditures to support their bid to host the NBADF, we have not seen any legislative initiatives to change state laws to clarify the role of state and local law enforcement and state animal public health officials to the increased potential for an FMD outbreak in their state that could be directly associated with a major

Federal facility. Federal and state officials seem unwilling to discuss these scenarios, especially in public, and will instead respond that a) this research is really important and b) an FMD or other FAD outbreak cannot occur from the proposed facility.

Perceived risk also manifests itself in the fact that even if farmers and ranchers are fully informed and aware of the risks to their individual operations, and even if local, state, and federal officials act in complete coordination, optimal FMD outbreak response plans will burden civil liberties, commercial and civic obligations, and possibly exceed physical ability or political will to execute these plans. According to the NIJ report, quarantine areas would have to be quickly established and enforced in the immediate vicinity around a six-mile radius. Additional roadblocks would also be needed to restrict traffic only to necessary travel over a much broader area, possibly state wide. On family farms and ranches, tissues from infected animals would have to be collected and preserved. All commercial livestock would have to be destroyed and disposed of in a timely manner. Livestock production facilities, marketing facilities, or processing facilities would all be quarantined and face expensive and problematic decontamination procedures. Contractual obligations such as contracts to supply agriculture product to market or receive agricultural inputs would be defaulted. Civic obligations such as sending one's children to school, appearing in court for jury duty, or even responding to a call up of the National Guard to address this emergency would be problematic for anyone in the affected area.

If the disease works its way into the wildlife population, there may be no physical means to enforce a plan to destroy and dispose of infected populations of wildlife. For example, according to the North Carolina Department of Fish and Wildlife, the deer population in the vicinity of the proposed NBADF facility in that state is about 45-50 animals per square mile. This means that within a fifty-mile radius of the facility, conservatively speaking, there would be a population of 35,000 deer. According to Dr. John Fischer, professor at the University of Georgia college of Veterinary Medicine and Director of the Southeastern Cooperative Wildlife Disease Study, "There are no plans in place to systematically depopulate wildlife to control an FMD outbreak," both because, in his view, it is "...physically impossible and socially unacceptable." Lacking the physical ability or political will to control an FMD outbreak in both the domestic as well as wild animal populations, it is nearly inevitable in the view of the National Grange that even a minor outbreak of FMD in the vicinity of the NBADF could spread well beyond the initial containment areas.

We would have a greater degree of comfort if DHS was forthright in explaining the consequences of a potential FMD outbreak in each of the individual communities, specifically addressing the ecological, commercial, and civil liberties implications of an FMD outbreak at or near the NBADF facility as part of its site selection process, and also if we were assured that sufficient federal funds to address the contingency planning as well as implementation of any contingency plan were to be available before the construction of a mainland NBADF facility commenced. However, under Homeland Security Presidential Directive 7, funding for preparing and responding to an agroterrorism attack such as the release of FMD is discretionary for DHS, not mandatory.

However, in the view of the National Grange, a far better response that would mitigate potential risks from a potential outbreak of FMD from a federally funded research facility is to select a site for the NBADF that is geographically isolated as much as possible from the environmental, commercial, and civic infrastructure of the mainland, such as the Plum Island facility.

Mr. Chairman, the National Grange appreciates the opportunity to present our views on the future location of the National Bio-and Agro Defense Facility. We strongly believe that the selection process for this facility has under appreciated the need for geographic isolation of a facility like this as a prudent, reasonable, and cost effective security measure that will assure that our nation can have both a world class research bio and agro research facility and the assurance that this facility will not pose accidental or incidental risk to rural communities in which potentially tens of thousands of family farmers and ranchers live.

I would be happy to take questions about our testimony.

Sincerely,

Leroy Watson, Legislative Director  
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# The National Grange

Of the Order of Patrons of Husbandry

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*Building Communities*

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April 14, 2008

The Honorable Ed Schafer, Secretary  
U.S. Department of Agriculture  
Jamie L. Whitten Federal Building  
1400 Independence Ave., S.W.  
Room 200-A  
Washington, DC 20250

Dear Secretary Schafer:

The National Grange, the nation's oldest general farm and rural public interest organization representing family farmers and rural citizens, strongly opposes the development of a Foot-and-Mouth Disease research facility on the United States Mainland. Currently this disease research is accomplished on an isolated island laboratory in New York's Long Island Sound, far away from U. S. livestock, and thus minimizing the risk for a catastrophic outbreak, which would devastate our domestic livestock industry. The research accomplished includes vaccine and drug development, testing of imported animals, and professional training.

The Bush administration is proposing additional highly sensitive research at a new National Bio Defense Facility on the U. S. mainland near hundreds of thousands of livestock. Proposed sites for the new laboratory include the states of Kansas, Georgia, North Carolina, Texas, and Mississippi. The National Grange strongly believes any outbreak containment would be more successful at the existing isolated facility than at a proposed mainland site. The Foot-and-Mouth virus, which does not affect humans, is nonetheless, highly contagious and can be carried by breath, clothes, and vehicles. Bio-security will always be an issue on the mainland so placing a new research facility on the continental United States greatly increases the risk of a catastrophic outbreak. Consequently we recommend renovating the existing facility to obtain the security necessary to perform higher-level research such as viral transfer from animals to humans rather than building a new facility on the continental U. S.

Proponents of a new mainland facility say modern safety rules at labs are sufficient to avoid any potential outbreak. But incidents in Britain have demonstrated that the foot-and-mouth virus can cause remarkable economic havoc, and that the virus can escape from a facility. An epidemic in 2001 devastated Britain's livestock industry, as the government slaughtered 6 million sheep, cows and pigs. Last year, in a less serious outbreak, Britain's health and safety agency concluded the virus probably escaped from a site shared by a government research center and a vaccine maker. Other outbreaks have occurred in Taiwan in 1997 and China last year and in 2006.

The National Grange urges you to consider bio-security and the devastating negative economic consequences of a domestic outbreak of foot and mouth disease. We need to minimize those risks by utilizing the existing research facility on an island removed from the domestic livestock. Thank you.

Sincerely,

Leroy Watson, Legislative Director  
National Grange of the Patrons of Husbandry



United States  
Department of  
Agriculture

MAY 16 2008

Animal and  
Plant Health  
Inspection  
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Mr. Leroy Watson  
Legislative Director  
National Grange of the Patrons of Husbandry  
shamfam5@verizon.net

Dear Mr. Watson:

Thank you for your letter of April 30, 2008, to Secretary Edward T. Schafer on behalf of the National Grange concerning Plum Island Animal Disease Center (PIADC) research and diagnostic activities.

We recognize your concern and appreciate this opportunity to respond. As you may know, in June 2003, operational responsibility for the PIADC transferred from the U.S. Department of Agriculture (USDA) to the U.S. Department of Homeland Security (DHS) under the Homeland Security Act of 2002. We have developed a strong, collaborative partnership with DHS, and are working together to establish the National Bio- and Agro-Defense Facility (NBAF), a next-generation facility to replace the current PIADC structures. Although DHS is ultimately responsible for the selection of an NBAF site, USDA has been closely involved throughout the process. Our Agency of USDA and USDA's Agricultural Research Service have provided detailed program requirements to DHS, and we have representatives on the site selection committee, the site inspection team, and the environmental impact statement (EIS) team. Because DHS is responsible for the selection of the NBAF site, you may wish to contact DHS directly, the address is DHS, Building 410, 245 Murray Lane SW., Washington, D.C. 20528. In addition, DHS has a Web page with information about the NBAF at [www.dhs.gov/nbaf](http://www.dhs.gov/nbaf).

Since 1954, the PIADC has played a critical role in helping USDA develop the tools and expertise needed to protect U.S. livestock from foreign animal diseases (FAD) such as foot-and-mouth disease (FMD). However, the current state of the aging facility has created a backlog of needed space for important experiments, diagnostic development, and training efforts. For instance, USDA cannot carry out biosecurity level 4 (BSL-4) activities at the PIADC, meaning that the United States does not currently have a facility to address certain high-consequence, zoonotic diseases such as Rift Valley fever, Nipah, and Hendra.



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Mr. Leroy Watson  
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DHS is currently preparing an EIS considering six site alternatives, including Plum Island and mainland locations. While we understand concerns about moving certain FAD research activities to the U.S. mainland, we assure you that, with today's much more advanced technologies, neither location nor physical barriers dictate abilities to manage effective biosecurity and biosafety practices.

A 2002 study commissioned by USDA and completed by the Science Applications International Corporation (SAIC), found that the FMD virus and other exotic foreign animal diseases of concern could be fully and safely contained within a BSL-3 laboratory, as was being done at the time in other countries including Canada, Germany, and Brazil. A second SAIC study also concluded that there was a valid USDA need for a BSL-4 facility, and that a BSL-4 facility for large animal work could be safely located on the mainland.

In planning for the NBAF, we recognize the absolutely essential need for state-of-the-art biosafety practices and procedures, including stringent and rigorous safety measures within the laboratories themselves, to prevent disease organisms from escaping into the environment. Situations such as the recent suspected release of live FMD virus from the Pirbright campus in England only serve to highlight this importance. In fact, we can use that example as a learning opportunity to make sure that the design and maintenance of the U.S. NBAF facility enables us to carry out the essential activities needed to protect the Nation from FADs while ensuring the highest level of biosafety.

We also wish to point out that, among other potential advantages, locating the NBAF in a more accessible location (i.e., on the mainland) would enhance the speed with which USDA could respond to a potential FAD threat. There are other benefits as well: the cost of living would be lower for employees; personnel recruitment would be easier; the facility would be more accessible if weather conditions or emergency situations force air traffic shutdowns; and, the facility would not be subject to the occasional wind closures that we experience at the PIADC due to rough waters.

We hope this information is helpful and demonstrates our commitment to ensuring that our diagnostic capabilities and resources reflect the new and changing FADs that continue to emerge.

Sincerely,

  
Cindy J. Smith  
Administrator



United States  
Department of  
Agriculture

MAY 16 2008

Animal and  
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